

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARIO MEDINA,

§

Plaintiff,

§

v.

§

Case No. 4:22-cv-2255

**VERBRI MANAGEMENT, LLC,
VERNON BRIDWELL AND PATRICIA
BRIDWELL, INDIVIDUALLY,**

§

Defendants.

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**MOTION FOR LEAVE TO FILE
SETTLEMENT AGREEMENT UNDER SEAL**

Plaintiff Mario Medina files this Motion Leave to File Settlement Agreement under Seal and respectfully show as follows:

1. After mediation of this case, the Parties came to a resolution of this matter, and entered into a settlement agreement. All Parties signed the settlement agreement. The settlement agreement contains a confidentiality provision. Plaintiff seeks leave to file the settlement agreement under seal, labeled Exhibit A, which will be filed immediately after this Motion is filed.

2. On August 18, 2023, Plaintiff Mario Medina executed the parties' written settlement agreement. On August 29, 2023, Defense counsel emailed to Plaintiff's counsel a signed copy of the settlement agreement executed by Defendants.

3. According to the settlement agreement's terms, payment to Plaintiff was due within 30 days after Plaintiff Medina Signed the Agreement, which would have made payment due on or about September 17, 2023.

4. As it is now October 31, 2023, and no payment has been received, Plaintiff seeks this Court's assistance in compelling Defendants to comply with the Parties' signed settlement agreement. It should be noted that Defense counsel has been working diligently with his clients and with the undersigned, and has always maintained open lines of communication with Plaintiff's counsel.

5. Plaintiff desires to have this Court enforce the Settlement Agreement and enter Judgment against Defendants, jointly and severally, for the settlement amount, as set forth more fully in Plaintiff's forthcoming Motion to Enforce and Enter Judgment.

6. However, because the Settlement Agreement is confidential, Plaintiff does not want to simply attach the Settlement Agreement to his Motion to Enforce the Settlement Agreement and Enter Judgment. As such, Plaintiff seeks leave of this Court to file the Settlement Agreement under seal, to preserve the confidentiality of the Agreement.

Conclusion

Plaintiff respectfully asks this Court to grant leave to file the Settlement Agreement under seal for the purposes of Plaintiff's Motion to Enforce Settlement Agreement and Enter Judgment.

Respectfully submitted,

WELMAKER LAW, PLLC

/s/ Douglas B. Welmaker
Douglas B. Welmaker
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that I attempted in good faith to confer with counsel for Defendants prior to filing this and counsel was unable to take a position on this issue.

/s/ Douglas B. Welmaker
Douglas B. Welmaker

CERTIFICATE OF SERVICE

I hereby certify that on this 31st of October, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Douglas B. Welmaker
Douglas B. Welmaker